

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

OUMAROU BOCOUM,

*Plaintiff,*

v.

DAIMLER TRUCKS NORTH AMERICA LLC,  
TRW AUTOMOTIVE U.S. LLC

*Defendants.*

-----X

**TRW AUTOMOTIVE U.S.  
LLC’S ANSWER TO  
PLAINTIFF’S AMENDED  
VERIFIED COMPLAINT**

Case No.: 1-17-cv-07636-ER

Defendant TRW Automotive U.S. LLC (“TRW US LLC”) responds to Plaintiff’s Amended Verified Complaint (“Complaint”) as follows:

**Rule 12(b) Defenses**

**First Defense:** TRW US LLC asserts the defense of lack of personal jurisdiction under Federal Rule of Civil Procedure 12(b)(2).

**Second Defense:** TRW US LLC asserts the defense of failure to state a claim under Federal Rule of Civil Procedure 12(b)(6).

### **Specific Denials**

#### **Response to “As and For a First Cause of Action on Behalf of Plaintiff, Oumarou Bocoum”<sup>1</sup>**

1. TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 1. Accordingly, TRW US LLC denies the allegations in Paragraph 1 at this time.

2. The allegations in Paragraph 2 are directed to a party other than TRW US LLC. If a response is required, TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 2. Accordingly, TRW US LLC denies the allegations in Paragraph 2 at this time.

3. The allegations in Paragraph 3 are directed to a party other than TRW US LLC. If a response is required, TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 3. Accordingly, TRW US LLC denies the allegations in Paragraph 3 at this time.

4. The allegations in Paragraph 4 are directed to a party other than TRW US LLC. If a response is required, TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 4. Accordingly, TRW US LLC denies the allegations in Paragraph 4 at this time.

5. The allegations in Paragraph 5 are directed to a party other than TRW US LLC. If a response is required, TRW US LLC lacks knowledge or information sufficient

---

<sup>1</sup> TRW US LLC includes the headings used in Plaintiff’s Amended Verified Complaint solely for ease of reference. To the extent such headings are deemed to contain factual allegations, TRW US LLC explicitly denies such allegations.

to form a belief about the truth of the allegations in Paragraph 5. Accordingly, TRW US LLC denies the allegations in Paragraph 5 at this time.

6. The allegations in Paragraph 6 are directed to a party other than TRW US LLC. If a response is required, TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 6. Accordingly, TRW US LLC denies the allegations in Paragraph 6 at this time.

7. TRW US LLC admits it is a limited liability company organized under the laws of Delaware. TRW US LLC denies the remainder of the allegations in Paragraph 7.

8. TRW US LLC admits it is authorized to conduct business in New York. TRW US LLC denies the remainder of the allegations in Paragraph 8.

9. TRW US LLC admits it conducts business in New York. TRW US LLC denies the remainder of the allegations in Paragraph 9, as worded.

10. The allegations in Paragraph 10 are directed to a party other than TRW US LLC. If a response is required, TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 10. Accordingly, TRW US LLC denies the allegations in Paragraph 10 at this time.

11. The allegations in Paragraph 11 are directed to a party other than TRW US LLC. If a response is required, TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 11. Accordingly, TRW US LLC denies the allegations in Paragraph 11 at this time.

12. The allegations in Paragraph 12 are directed to a party other than TRW US LLC. If a response is required, TRW US LLC lacks knowledge or information sufficient

to form a belief about the truth of the allegations in Paragraph 12. Accordingly, TRW US LLC denies the allegations in Paragraph 12 at this time.

13. The allegations in Paragraph 13 are directed to a party other than TRW US LLC. If a response is required, TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 13. Accordingly, TRW US LLC denies the allegations in Paragraph 13 at this time.

14. The allegations in Paragraph 14 are directed to a party other than TRW US LLC. If a response is required, TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 14. Accordingly, TRW US LLC denies the allegations in Paragraph 14 at this time.

15. The allegations in Paragraph 15 are directed to a party other than TRW US LLC. If a response is required, TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 15. Accordingly, TRW US LLC denies the allegations in Paragraph 15 at this time.

16. TRW US LLC admits it supplies and manufactures in part certain steering gears that may be installed by some original equipment manufacturers in some motor vehicles, including some 2007 Freightliner commercial trucks. TRW US LLC denies the remainder of the allegations in Paragraph 16, as worded.

17. The allegations in Paragraph 17 are directed to a party other than TRW US LLC. If a response is required, TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 17. Accordingly, TRW US LLC denies the allegations in Paragraph 17 at this time.

18. The allegations in Paragraph 18 are directed to a party other than TRW US LLC. If a response is required, TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 18. Accordingly, TRW US LLC denies the allegations in Paragraph 18 at this time.

19. The allegations in Paragraph 19 are directed to a party other than TRW US LLC. If a response is required, TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 19. Accordingly, TRW US LLC denies the allegations in Paragraph 19 at this time.

20. Paragraph 20 of the Complaint is, in part, a legal conclusion to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. TRW US LLC admits it supplies and manufactures in part certain steering gears that may be installed by some original equipment manufacturers in some motor vehicles, including some 2007 Freightliner commercial trucks. TRW US LLC denies the remainder of the allegations in Paragraph 20 directed to TRW US LLC, as worded. To the extent the allegations in Paragraph 20 are directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

21. To the extent the allegations in Paragraph 21 are directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time. To the extent the allegations in Paragraph 21 are directed to TRW US LLC, TRW US LLC admits it manufactured in part certain steering gears that were installed in some 2007 Freightliner

commercial trucks. TRW US LLC denies the remainder of the allegations directed to TRW US LLC in Paragraph 21.

22. TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 22. Accordingly, TRW US LLC denies the allegations in Paragraph 22 at this time.

23. TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 23. Accordingly, TRW US LLC denies the allegations in Paragraph 23 at this time.

24. The allegations in Paragraph 24 are directed to a party other than TRW US LLC. If a response is required, TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 24. Accordingly, TRW US LLC denies the allegations in Paragraph 24 at this time.

25. TRW US LLC admits it designed in part, manufactured in part, and final assembled the steering gear in the 2007 Freightliner commercial truck with vehicle identification number 1FUJA6CK67LV21369 (“the Subject Vehicle”). TRW US LLC denies the remainder of the allegations in Paragraph 25.

26. TRW US LLC denies the allegations in Paragraph 26.

27. TRW US LLC denies the allegations in Paragraph 27.

28. The allegations in Paragraph 28 are directed to a party other than TRW US LLC. If a response is required, TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 28. Accordingly, TRW US LLC denies the allegations in Paragraph 28 at this time.

29. Paragraph 29 of the Complaint is, in part, a legal conclusion to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 29 can be construed as factual allegations directed to TRW US LLC, TRW US LLC denies such allegations. To the extent the allegations in Paragraph 29 are directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

30. TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 30. Accordingly, TRW US LLC denies the allegations in Paragraph 30 at this time.

31. TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 31. Accordingly, TRW US LLC denies the allegations in Paragraph 31 at this time.

32. TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 32. Accordingly, TRW US LLC denies the allegations in Paragraph 32 at this time.

33. TRW US LLC lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 33. Accordingly, TRW US LLC denies the allegations in Paragraph 33 at this time.

34. Paragraph 34 of the Complaint is, in part, a legal conclusion to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 34 can be construed as factual

allegations directed to TRW US LLC, TRW US LLC denies such allegations. To the extent the allegations in Paragraph 34 are directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

35. Paragraph 35 of the Complaint is, in part, a legal conclusion to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 35 can be construed as factual allegations directed to TRW US LLC, TRW US LLC denies such allegations. To the extent the allegations in Paragraph 35 are directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

36. Paragraph 36 of the Complaint is, in part, a legal conclusion to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 36 can be construed as factual allegations directed to TRW US LLC, TRW US LLC denies such allegations. To the extent the allegations in Paragraph 36 are directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.



**Response to “As and For a Second Cause of Action on Behalf of Plaintiff, Oumarou Bocoum”**

37. In Paragraph 37, Plaintiff incorporates the allegations previously set forth in his Complaint. Accordingly, TRW US LLC restates and incorporates by reference each of its responses set forth above.

38. Paragraph 38 of the Complaint is, in part, a legal conclusion to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 38 may be construed as factual allegations directed to TRW US LLC, TRW US LLC denies such allegations. To the extent the allegations in Paragraph 38 may be construed as factual allegations directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

39. Paragraph 39 of the Complaint is, in part, a legal conclusion to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 39 may be construed as factual allegations directed to TRW US LLC, TRW US LLC denies such allegations. To the extent the allegations in Paragraph 39 may be construed as factual allegations directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

40. Paragraph 40 of the Complaint is, in part, a legal conclusion to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 40 may be construed as factual allegations directed to TRW US LLC, TRW US LLC denies such allegations. To the extent the allegations in Paragraph 40 may be construed as factual allegations directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

41. Paragraph 41 of the Complaint is, in part, a legal conclusion to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 41 may be construed as factual allegations directed to TRW US LLC, TRW US LLC denies such allegations. To the extent the allegations in Paragraph 41 may be construed as factual allegations directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

42. The allegations in Paragraph 42 are legal conclusions to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 42 may be construed as factual allegations directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

43. The allegations in Paragraph 43 are legal conclusions to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 43 may be construed as factual allegations directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

44. The allegations in Paragraph 44 are legal conclusions to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 44 may be construed as factual allegations directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

45. To the extent the allegations in Paragraph 45 are directed to TRW US LLC, TRW US LLC denies those allegations. To the extent the allegations in Paragraph 45 are directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

46. Paragraph 46 of the Complaint is, in part, a legal conclusion to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 46 can be construed as factual allegations directed to TRW US LLC, TRW US LLC denies such allegations. To the extent the allegations in Paragraph 46 can be construed as factual allegations directed to parties

other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

47. Paragraph 47 of the Complaint is, in part, a legal conclusion to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 47 can be construed as factual allegations directed to TRW US LLC, TRW US LLC denies such allegations. To the extent the allegations in Paragraph 47 can be construed as factual allegations directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

48. Paragraph 48 of the Complaint is, in part, a legal conclusion to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 48 can be construed as factual allegations directed to TRW US LLC, TRW US LLC denies such allegations. To the extent the allegations in Paragraph 48 can be construed as factual allegations directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

49. To the extent the allegations in Paragraph 49 are directed to TRW US LLC, TRW US LLC denies such allegations. TRW US LLC lacks knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 49; accordingly, TRW US LLC denies such allegations at this time.

50. Paragraph 50 of the Complaint is, in part, a legal conclusion to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 50 can be construed as factual allegations directed to TRW US LLC, TRW US LLC denies such allegations. To the extent the allegations in Paragraph 50 can be construed as factual allegations directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

**Response to “As and For a Third Cause of Action on Behalf of Plaintiff, Oumarou Bocoum”**

51. In Paragraph 51, Plaintiff incorporates the allegations previously set forth in his Complaint. Accordingly, TRW US LLC restates and incorporates by reference each of its responses set forth above.

52. Paragraph 52 of the Complaint is, in part, a legal conclusion to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 52 can be construed as factual allegations directed to TRW US LLC, TRW US LLC denies such allegations. To the extent the allegations in Paragraph 52 can be construed as factual allegations directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to

form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

53. Paragraph 53 of the Complaint is, in part, a legal conclusion to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 53 can be construed as factual allegations directed to TRW US LLC, TRW US LLC denies such allegations. To the extent the allegations in Paragraph 53 can be construed as factual allegations directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

54. Paragraph 54 of the Complaint is, in part, a legal conclusion to which no response is required. TRW US LLC respectfully refers all questions of law to this Honorable Court. To the extent the allegations in Paragraph 54 can be construed as factual allegations directed to TRW US LLC, TRW US LLC denies such allegations. To the extent the allegations in Paragraph 54 can be construed as factual allegations directed to parties other than TRW US LLC, TRW US LLC lacks knowledge or information sufficient to form a belief about their truth; accordingly, TRW US LLC denies such allegations at this time.

**Response to “WHEREFORE” Paragraph**

55. TRW US LLC denies Plaintiff is entitled to the relief sought in the Paragraph beginning, “WHEREORE” on page 12 of the Complaint. TRW US LLC requests that a

take-nothing judgment be entered against Plaintiff, that TRW US LLC be awarded its costs of suit, and that TRW US LLC receive any and all further relief to which it is justly entitled.

56. TRW US LLC hereby denies each and every allegation contained in the Complaint not specifically admitted or controverted herein.

### **General and Affirmative Defenses**

**Third Defense:** The alleged injuries and/or damages complained of by Plaintiff were not proximately caused by any acts or omissions of TRW US LLC.

**Fourth Defense:** TRW US LLC's conduct and the subject product at all times conformed with all applicable federal statutes and regulations. Plaintiff's claims may be barred, in whole or in part, by the doctrine of federal preemption and the Supremacy Clause of the United States Constitution contained in Article VI, Clause 2.

**Fifth Defense:** Any product in question supplied by TRW US LLC was not defective in any respect.

**Sixth Defense:** All or a portion of Plaintiff's claims may be barred by the applicable statutes of limitation and/or statute of repose.

**Seventh Defense:** Some party or parties other than TRW US LLC, over whom TRW US LLC exercised no control and for whom TRW US LLC was not responsible, may have been the sole proximate cause of Plaintiff's alleged injuries and/or damages.

**Eighth Defense:** The injuries and damages claimed by Plaintiff, if any, may have resulted from an intervening or superseding cause or causes, and any act or omission on the part of TRW US LLC was not the proximate or competent producing cause of such alleged injuries and damages.

**Ninth Defense:** Plaintiff's claims may be barred, in whole or in part, to the extent the evidence shows Plaintiff failed to mitigate his alleged damages.

**Tenth Defense:** Plaintiff's claims should be barred in whole or in part to the extent Plaintiff's damages if any, were brought about or caused by a post-manufacture alteration, modification, misuse, abuse, or change in any of the products referred to in Plaintiff's Complaint.

**Eleventh Defense:** Any condition of the subject vehicle alleged to have constituted a breach of warranty by TRW US LLC was not a proximate cause of Plaintiff's alleged injuries.

**Twelfth Defense:** Plaintiff's claims for breach of warranty are barred by a lack of privity and Plaintiff's failure to give adequate and proper notice of any deficiencies in the product.

**Thirteenth Defense:** TRW US LLC did not breach any express or implied warranty allegedly owed to Plaintiff, and by reason thereof, Plaintiff may not recover damages from TRW US LLC.

**Fourteenth Defense:** TRW US LLC alleges, upon information and belief, that the culpable conduct of Plaintiff, if not the sole cause of the injuries and damages allegedly sustained as a result of the crash described in the Complaint, contributed to such injuries and damages, and the damages recoverable by Plaintiff in this action, if any, must be diminished in the proportion which the culpable conduct of Plaintiff bears to the culpable conduct which caused the alleged injuries and damages.



**Fifteenth Defense:** Plaintiff's claims may be barred, in whole or in part, by the doctrines of contributory and/or comparative negligence.

**Sixteenth Defense:** The damages as alleged in Plaintiff's Complaint were caused in whole or in part or were contributed to by the culpable conduct or want of care and assumption of risk on the part of Plaintiff, and without any negligence, fault, or want of care on the part of TRW US LLC, and Plaintiff's alleged damages should be diminished accordingly.

**Seventeenth Defense:** TRW US LLC requests the Court reduce the amount of damages to be recovered by Plaintiff by a percentage equal to their percentage of responsibility.

**Eighteenth Defense:** If TRW US LLC is found liable for any damages allegedly sustained by Plaintiff, any liability against TRW US LLC shall be limited to its equitable share of total liability as provided by Article 16 of the New York Civil Practice Law and Rules.

**Nineteenth Defense:** If Plaintiff recovers a verdict against TRW US LLC, it is requested that the Court have the liability of TRW US LLC apportioned pursuant to Article 14 and Article 14-A of the New York Civil Practice Law and Rules.

**Twentieth Defense:** Plaintiff's claims may also be barred because TRW US LLC's product conformed to the technological, scientific, and industrial state of the art at the time the product was first sold.

**Twenty-first Defense:** There is no basis in law or fact for the imposition of punitive damages with respect to Plaintiff's claims against TRW US LLC. There is no clear and

convincing evidence TRW US LLC was guilty of willful misconduct, malice, fraud, wantonness, oppression, or entire want of care that would raise the presumption of conscious indifference to the consequences and, accordingly, Plaintiff is not entitled to recover punitive damages in any sum whatsoever.

**Twenty-second Defense:** Plaintiff's Complaint, to the extent it seeks recovery of exemplary or punitive damages, violates TRW US LLC's right to protection from "excessive fines" as provided in the Eighth Amendment of the United States Constitution and right to procedural due process under the Fourteenth Amendment of the United States Constitution, and therefore fails to state a cause of action or set forth a claim upon which such damages can be awarded. The claim for "punitive damages" is barred by the provisions of Article VI of the Constitution of the United States.

**Twenty-third Defense:** TRW US LLC reserves the right to amend this Answer as needed.

**Twenty-fourth Defense:** Plaintiff's recovery, if any, must be limited to the extent Plaintiff has received payment through any collateral sources, pursuant to CPLR § 4545.

### **Jury Demand**

TRW US LLC hereby demands a jury trial in accordance with Rule 38 of the Federal Rules of Civil Procedure.

### **Prayer**

TRW US LLC requests that a take-nothing judgment be entered against Plaintiff, that TRW US LLC be awarded its costs of suit, and that TRW US LLC receive any and all further relief to which it is justly entitled.

Respectfully submitted,

By: s/ B. Keith Gibson  
James C. Ughetta  
B. Keith Gibson  
LITTLETON PARK JOYCE  
UGHETTA & KELLY LLP  
The Centre at Purchase  
4 Manhattanville Road, Suite 202  
Purchase, New York 10577  
Telephone: (914) 417-3400

**Attorneys for Defendant**  
**TRW Automotive U.S. LLC**

**Certificate of Service**

This instrument was served on the following counsel in compliance with Rule 5 of the Federal Rules of Civil Procedure on December 1, 2017:

Nicholas I. Timko  
Kahn Gordon Timko & Rodriques, PC.  
20 Vesey St., Ste. 300  
New York, NY 10007  
T: (212) 233-2040  
F: (212) 732-4666

Robert M. Cook  
GOLDBERG SEGALLA LLP  
902 Carnegie Center, Suite 100  
Princeton, New Jersey 08540-6530

s/ B. Keith Gibson  
B. Keith Gibson